

Approving Technology Plans

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Overview

- Purpose of tech plans
- Roles in the tech planning process
- Basic tech plan requirements
- Tech plan composition (five elements)
- Revising tech plans
- USAC tech plan compliance reviews
- Questions

E-rate and Tech Plans

- Federal Communications Commission rules require schools and libraries to write technology plans when they are receiving support for more than basic telephone service
 - Basic telephone service is defined as wireline or wireless single-line voice service (e.g., local, cellular, and/or long distance) as well as mandatory fees associated with such service (e.g., federal and state taxes, universal service fees, etc.)

Tech Plan Needed?

NO

- Local/long distance service (landline or cellular)
- 800 service
- Key system lines
- Intra-LATA and Inter-LATA service

YES

- Centrex (before FY2008)
- OC-3, frame relay, ISDN
- PBXs
- Internet Access
- Internal Connections
- Basic Maintenance

Purpose of the Tech Plan

- Tech plans ensure that schools and libraries are prepared to effectively use the requested services to integrate telecommunications and Internet access into the educational program or library services they provide.
- Tech plans should support and validate the services requested on the Form 471.

Tech Plan Approvers (TPAs)

- USAC certifies certain organizations to approve technology plans
 - Certified Technology Plan Approvers (TPAs) are listed on the USAC website. The listing indicates where they approve plans and what type of entities they approve (public schools, private schools, libraries, etc.)
 - [Certified Tech Plan Approver Locator Tool](#) assists applicants in locating an approver
 - An effective tech plan review can help to assure applicants that their tech plans meet program requirements

Who Does What

- In general, school districts write tech plans to cover their individual schools.
- In general, library systems write tech plans to cover their outlets/branches.
- Individual schools or library outlets/branches can write their own tech plans.
- Consortium-level plans are generally not acceptable by USAC. (Consortium members should have their own plan, as consortium-wide plans are too high-level.)

Who Does What

- USAC certifies TPAs to approve plans for specific entity types and regions
- TPAs receive, review, and approve school and/or library technology plans
- TPAs provide tech plan guidance regarding USAC and state/local requirements
- TPAs issue tech plan approval letters

What TPAs Do

- TPAs verify that tech plans include:
 - The entities covered by tech plan
 - Contact information
 - Time period covered by the tech plan
 - Five elements
 - Appropriate level of complexity
- TPAs issue tech plan approval letters (see [sample letter](#) on USAC website)

Requesting Approvals

- Public schools go to their state education agency
- Public libraries go to their state library
- Other eligible entities, such as private schools, go to associations or to their state (if, for example, they're not affiliated with a private school association or similar agency)
- USAC does not approve technology plans

Approval Letter

- Once a tech plan is approved, TPAs issue a letter containing:
 - Name of the school/library/district
 - Name and contact info of the TPA
 - Date of the approval
 - Effective start and end dates of tech plan
- TPAs should encourage applicants to retain their approval letter or other documentation (e.g., website screen print) for at least five years following their last date of service

Basic Tech Plan Requirements

- Tech plans must:
 - Be created before Form 470/RFP posting
 - Cover all 12 months of the funding year
 - Contain all five elements
 - Contain a sufficient level of detail to validate the E-rate request
 - Be approved by a USAC-certified TPA before Form 486 is filed or services start, whichever is sooner
 - In general, cover not more than 3 years

Important Terminology

- Written (same as created): When the tech plan first contains the five required elements in sufficient detail to support the services requested on the associated Form 470, USAC considers the tech plan to be written.
- The date this occurs is the Creation Date. The creation date must be prior to the date the associated Form 470 is posted to the USAC website.

Important Terminology

- Approved Date: A technology plan is considered to be approved for E-rate purposes on the date when it is approved by an USAC Certified TPA. The approval date should appear on the approval letter.

Timing

- Tech plans must be written before the Form 470 is filed
 - Applicants need to determine the services they require before filing their Form 470
- Tech plans must be approved before services start or Form 486 is filed (whichever is earlier)
 - Generally, this means on or before July 1 of the new funding year

Tech Plan Duration

- Technology plans should not cover more than three years due to the rapid development cycle of new technologies
 - LSTA plans for state library agencies and EETT plans for schools can cover five years
 - However, such plans should receive a significant “progress review” during the third year
- TPAs can set requirements and procedures around the tech plan approval timeframe

Is The Plan Good Enough?

- FCC Rules do not set specific standards for determining what is a “good enough” answer for each of the five required elements
- TPAs can set reasonable tech plan standards based on program requirements for approving tech plans
- TPAs may also set additional approval requirements to comply with other programs
- Tech plans must include appropriate dates (approval date, start and end date) and contact information

Five Required Elements

- Clear Goals and a Realistic Strategy
- Professional Development
- Needs Assessment
- Sufficient Budget
- Evaluation Process

Clear Goals/Realistic Strategy

- The tech plan must establish clear goals and a realistic strategy for using telecommunications and information technology to improve education or library services.

Clear Goals/Realistic Strategy

- Specific goals for using technology should identify:
 - Improvement that should occur from the use of technology by students, teachers, parents, and/or library patrons
 - Achievements and/or successes that can be attained using technology
 - Increased staff and student/library patron competency with using technology
 - Additional Internet and/or telecommunication options for classrooms or public areas of a library
 - Accessibility to technology

Clear Goals/Realistic Strategy

- Realistic strategies should identify:
 - How the school or library will develop and integrate the technology (e.g., how many computers will have Internet access)
 - Standards required for implementation of the technology
 - Technology needed for the future to maintain or enhance the current instructional or library environment

Professional Development

- The tech plan must have a professional development strategy to ensure that staff know how to use these new technologies to improve education or library services.

Professional Development

- Describe and list the professional development activities required of staff to train properly on the technology in the school or library
 - Training is more than just how to turn on the computer
 - Identify person or group in charge of planning and coordinating staff training
 - Verify current levels of training

Professional Development

- Details of training
 - Methods of training to be used (classroom, seminars, Train-the-Trainer, etc.)
 - How training supports the curriculum or library usage goals
 - Documentation of training (sign-in sheets, computer lab logs, lists of in-service activities, etc.)

Needs Assessment

- The tech plan must include an assessment of the telecommunication services, hardware, software, and/or other services that will be needed to improve education or library services.

Needs Assessment

- Provide a status of the existing technology, such as:
 - Telephone system
 - Building Infrastructure (e.g., electrical capacity, cooling system)
 - Computer hardware and software
 - Internet access
 - Staff training

Needs Assessment

- Based on the current technology, describe new technology needs, such as:
 - Adding a firewall or replacing servers
 - Adding upgrades to phone system
 - Adding network switches
 - Adding cable drops
 - Installing a new network
 - Classroom/lab materials

Needs Assessment

- Describe maintenance needed for new and existing equipment
 - How often will the technology be serviced? (e.g., daily, weekly, monthly, etc.)
 - What are the characteristics and capabilities of the equipment? (e.g., age, model, year, memory, etc.)

Sufficient Budget

- The tech plan must show how the school or library will:
 - Pay the non-discount share of the cost
 - Acquire and support the necessary resources (computers, training, electricity, software, etc.) needed to make effective use of the discounted services.

Sufficient Budget

- Include specifics about budgeted items and the sources of funding. For example:
 - Salaries (general school fund)
 - Telephones (E-rate funding and general school fund)
 - Desktop software (state funds)
- Budgets can be projections
 - Budgets should be based on reasonable expectations of receiving funding and incurring expenses

Evaluation Process

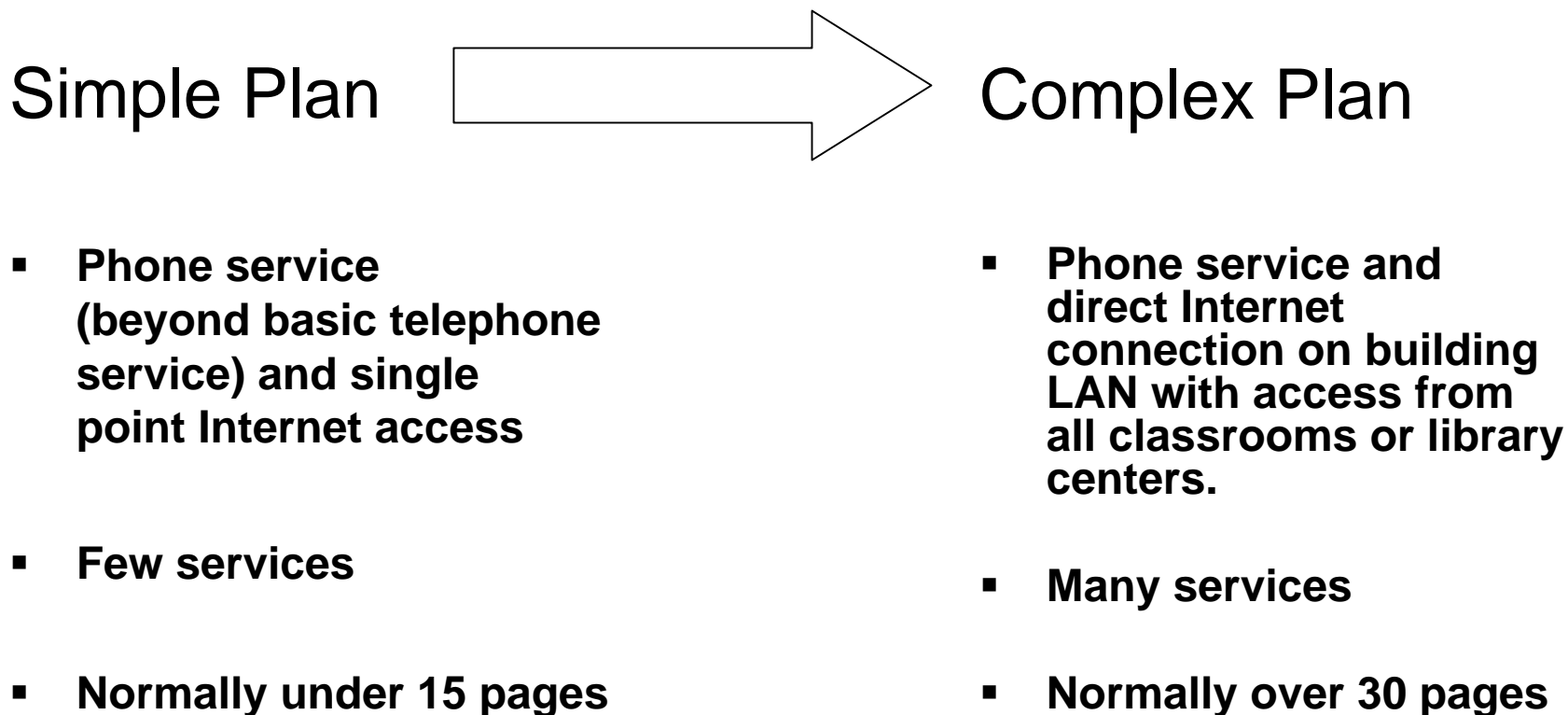
- The tech plan must include an evaluation process that enables the school or library to monitor progress toward specified goals and make mid-course corrections in response to new developments and opportunities as they arise.

Evaluation Process

- Evaluation process should describe:
 - How frequently the tech plan will be evaluated
 - The person(s) responsible for updating the plan
 - How progress toward the goals and objectives will be measured or monitored
 - If and how goals were met
 - Any unexpected outcomes
 - Any new needs that emerged
 - Any goals that are no longer relevant

Scope and Scale

The scope of the plan should match the scale of the technology



Plans for Other Programs

- Other federal, state, or local program may have tech plan requirements
- USAC does not require a tech plan in addition to other tech plans
 - However, if there is only one tech plan covering all programs, the information required under E-rate must be included in that tech plan
 - HINT: Include a cover sheet giving the page number(s) where each E-rate requirement is addressed

Revising Plans

- Through the evaluation process, the tech plan writer may discover that the tech plan need revisions or mid-course corrections. For example, if there are major changes, such as:
 - Budget Increase/shortfall
 - New technology introduced
 - New construction
 - Mergers and closures

Revising Plans

- Major Changes
 - If the changes are significant (e.g., building a local area network or starting a new initiative like distance learning), the technology plan should be re-approved
 - TPA can re-approve revised tech plan for balance of the original time period approved
 - A new tech plan incorporating the changes can be written to cover another three years

Revising Plans

- Minor Changes
 - If the changes are minor (e.g., exchanging one technology for another equivalent technology), the tech plan may not need to be amended
 - TPA can request copies of any changes
 - USAC does not expect a new approval letter
 - TPA should advise applicant to retain documentation of any changes

USAC Review of Tech Plans

- During application (Program Integrity Assurance or PIA) review, USAC may ask for a copy of the tech plan
 - USAC's questions will be:
 - When was the tech plan created?
 - Are the five required elements present?
 - Does the tech plan cover the funding year?
 - Is the scope of the tech plan proportional to the scale of the technology?

USAC Review of Tech Plans

- When the Form 486 is submitted, USAC may ask for a copy of the TPA letter
 - USAC will look for
 - Approval from TPA (paper or electronic)
 - Effective dates
 - Certified TPA name and organization

Pitfalls

- Tech plan does not contain all five required elements
- Tech plan is undated
- Time period the tech plan covers is not specified
- School or library used an approver who is not a TPA
- Tech plan was approved after services started (if necessary, USAC will adjust the service start date to the date the tech plan was approved)
- Tech plan does not support services being requested or technology currently in use
- Tech plan is not realistic based on TPA's expertise

Contact Info Changes

- Please notify USAC if any of your TPA contact information changes
 - TPA database records are linked to the USAC public website and TPA locator tool
 - Use the email link in the [Certified Tech Plan Approver Locator](#) to send updates to USAC

Sample Questions with Answers

Question #1

- Assuming that tech plans are approved for three years, what happens in the fourth year of a five-year contract?
 - The applicant should write a new tech plan for the fourth year before posting any new Forms 470. That plan should be approved before services start.
 - The applicant should also maintain a copy of the tech plan that formed the basis of the original Form 470 posting.
 - PIA may ask about both plans.

Question #2

- A tech plan needs to be updated before the original three-year approval period has expired. What should happen?
 - If the change is significant enough that a new Form 470 is required, the tech plan must be re-approved. This can be a new three-year approval or an approval for the time remaining.
 - If the update is within the scope of the original plan and Form 470, any changes should be documented and retained but do not need to be re-approved. However, TPAs can ask for documentation of any changes.

Question #3

- An application is denied because of a tech plan deficiency. What is the responsibility of the TPA who approved the plan?
 - Before FY2007, USAC stopped application review after the first denial reason and reported only that reason in the “FCDL Comment” field. This could give the appearance that a deficiency in a tech plan was the only reason for denial when in fact there were other problems with the application.
 - Beginning in FY2007, all denial reasons are listed on FCDLs.
 - USAC plans to reach out to TPAs as necessary if they approve a number of tech plans that show consistent problems.
 - It is unlikely that USAC will contact a TPA about problems with a specific tech plan.

Question #4

- Does the TPA need to track the creation date of the tech plan?
 - No. The TPA would not necessarily know when the tech plan was written.
 - However, the TPA can ask that the creation date be included as part of the tech plan when it is submitted for approval.

Question #5

- What budget information should appear in a tech plan if a final budget has not been approved?
 - Draft budgets are acceptable for tech plans.
 - Note that USAC will request a copy of an operating budget during a Selective Review. USAC requests this to verify that applicants have sufficient resources to (1) acquire and support the products and services in their tech plan that are not eligible for E-rate discounts and (2) pay their non-discount share.

Question #6

- What is the requirement for tech plan creation prior to Form 470 submission for the situations where tech plans can cover five years (LSTA, EETT)?
 - The “new” tech plan (the one that will cover the next five years) should be written before any “new” Forms 470 are posted.

Question #7

- Certain services are provided for “free,” but those services do not meet the needs of the school or library and additional services are purchased under E-rate. (For example, a 4.5 Mbps connection to the Internet is provided by the state but the school or library purchases a T-1 to meet requirements.) Should the tech plan describe this?
 - Yes, for two reasons:
 - USAC will understand that the “free” services are not duplicative if adequate explanation is provided.
 - USAC will have a complete picture of the technology and can ask fewer review questions to understand how everything fits together.